

EXHIBIT

I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Kohchise Jackson,

Plaintiff,

v.

Case No: 2:19-cv-13382

District Judge: Terrence G. Berg
Magistrate Judge: Patricia T. Morris

Corizon Health, Inc., et al.

Defendants.

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AFFIDAVIT OF JAMES H. MCQUISTON, D.O., FACOS, FACS

I, James H. McQuiston, D.O., FACOS, FACS, being first duly sworn, deposes and states:

1. My name is Dr. James H. McQuiston. I am board certified in general surgery and critical care surgery.
2. I have over thirty-two years' experience in complex abdominal surgery. I have extensive experience in the creation, reversal, care and treatment of colostomies.
3. I have been provided with, and reviewed, the medical records pertaining to the plaintiff, Kohchise Jackson, including his medical records prior to, during, and after his incarceration in the MDOC.
4. Mr. Jackson underwent a Hartmann's Procedure in December 2016. This is a procedure that involves removing a portion of colon and creates a colostomy and the lower portion of the colon is disconnected. His bladder was repaired. He tolerated the procedure well and had an uneventful postoperative course. Based on the records, he tolerated his colostomy well.
5. There is no specific time frame or standard for whether or when a reversal surgery must occur. Mr. Jackson had no medical necessity that required him to have a reversal surgery done before he completed his incarceration.

6. Psychological feelings should not take precedence over medical necessity or medical risks that are associated with surgical procedures, including reversals.
7. There is nothing in Mr. Jackson's records that indicates he was having issues or complications with his colostomy that necessitated a reversal. Mr. Jackson was not put at any risk nor suffered any damages or injuries by not having his colostomy reversal during his incarceration. When he had his reversal surgery done in 2019, he had a very uneventful recovery.
8. The statements made in this affidavit are true and accurate to the best of my current knowledge, information, and belief.

Dated: 8/15/2021, 2021



James H. McQuiston, D.O., FACOS, FACS

Subscribed and sworn to before me this
5th day of August 2021.

Elizabeth A. Smith
Elizabeth Smith, Notary Public
County of Macomb
Acting in Oakland
My Commission Expires: 08-09-2024

